

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Case No. 12-cv-6421 (KMK)

Plaintiff,

v.

EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL,

Defendants,

and

FAIRHILLS CAPITAL, INC.,

Relief Defendant.
-----X

Plaintiff's Exhibit List

<u>Exhibit #</u>	<u>Description</u>	<u>No Objection¹</u>		<u>Objection</u>
1	Payment Plan Order, DE 272	X		
2	Liquidating Trustee Order, DE 278	X		
3	6.7.22 Letter Kellas to UMB removing T'ee	X		
4	Rachmuth Escrow March 2022			Requires witness testimony
5	Rachmuth Escrow April 2022			Requires witness testimony
6	Rachmuth Escrow May 2022			Requires witness testimony
7	Rachmuth Escrow June 2022			Requires witness testimony
8	Rachmuth Escrow July 2022			Requires witness testimony

¹ Defendant is not objecting to the authenticity of any exhibits.

<u>Exhibit #</u>	<u>Description</u>	<u>No Objection¹</u>	<u>Objection</u>
9	Rachmuth Escrow August 2022		Requires witness testimony as to each transaction
10	Rachmuth Escrow August 2022		Requires witness testimony
11	Rachmuth Escrow September 2022		Requires witness testimony
12	Rachmuth Escrow September 2022		Requires witness testimony
13	Settlement Order 4/21/21 memorializes settlement 3/12/22.	X	
14	Share Issuance Notice asks for conversion on 2/22/22	X	
15	Issuance Resolution 2/22/22	X	
16	Stock Purchase Agreement 2/22/22	X	
17	Irrevocable Stock Power 2/22/22	X	
18	VGLS Issuance Opinion 2/24/22	X	
19-62	SPAs post incarceration		Defendant objects to Exhibits 47 and 53 -62 absent proof that the stock referenced in those agreements is derived from debt assigned to by Top Knot to Phase
63	Summary of post incarceration SPAs TK	X	
64	Summary of post incarceration SPAs Phase 1		Requires admission of the underlying exhibits into evidence
65	Summary of All TK and Phase 1 Sales		Requires admission of the underlying exhibits into evidence
66	Summary Exhibit of Funds Received into Rachmuth's Accounts		Requires admission of the underlying exhibits into evidence

<u>Exhibit #</u>	<u>Description</u>	<u>No Objection¹</u>	<u>Objection</u>
67	Wells Fargo Summary Analysis	X	
68	February Top Knot Wells Fargo -7379 Statements	X	
69	March Top Knot Wells Fargo -7379 Statements	X	
70	April Top Knot Wells Fargo -7379 Statements	X	
71	May Top Knot Wells Fargo -7379 Statements	X	
72	June Top Knot Wells Fargo -7379 Statements	X	
73	July Top Knot Wells Fargo -7379 Statements	X	
74	August Top Knot Wells Fargo -7379 Statements	X	
75	September Top Knot Wells Fargo -7379 Statements	X	
76	Tulane Payments	X	
77	Funds Marked FBO Top Knot	X	
78	Transfers Rachmuth to a Bronson Mexico account OBO		Requires admission of the underlying documents and transactions
79	Checks and Wires		Requires admission of the underlying documents and transactions
80	Funds Sent from Matthews to Rachmuth		Requires admission of the underlying documents and transactions

81	Summary of Funds from Rachmuth		
84	Exhibit 84 Top Knot Acct. x7379 Credits from Matthews Development February (Post Incarceration) through September 2022	X	
85	Exhibit 85 Summary of Matthews Receipts at Ex 84 to Top Knot Account x7379 by Month	X	
86	Kellas email admits TKI was not in compliance with Court Order.	X	
87	Summary of TKI Account Spending	X	
88	Disbursements to or on behalf of Dawn Bronson	X	
89	Checks Written on Top Knot Account x7379 February 28, 2022 - August 30, 2022	X	
90	Wires to Dawn Bronson	X	
91	Wires to Dawn Bronson's Webster Account	X	
92	Mortgage Payments	X	
93	Tulane Payments by Top Knot	X	
94	Transfers to Rachmuth	X	

95	Travel Expenses	X	
96	DLA Piper Expenses	X	
97	Transfer to Pena	X	
98	Transfers to TD Bank	X	
99	Withdrawals	X	
100	Retail	X	
101	Transfers to Selkirk @ US Bank	X	Requires witness testimony
102	Transfers to pawn shop	X	
103	Dining and drinks	X	
104	Payments to Archer & Greiner	X	
105	Pet Expenses	X	
106	Wire to Coast to Coast	X	
107	Miscellaneous Internet, Apple and Gaming Expenses	X	
109	Transfer to V2IP		
110	Global Settlement Agreement between Green Horseshoe LLC, Endicott Holdings Group LLC, Top Knot Inc. USA, Edward Bronson and Mark E. Pena.	X	
111	Email Referencing a Top Knot Sub Account		Requires witness testimony
112	HLLK Rachmuth notarized irrevocable transfer	X	
113	SPRV Stock Power	X	

114	Strickland letter re shares in UMB		Hearsay; Fed R. Evid. 602; Inadmissible speculation about the knowledge and intent of a third party.
115	Property in Bahamas and \$\$\$		Hearsay; Requires witness testimony; Inaccurate description of exhibit
116	Stem Capital Account reference		Requires witness testimony
117	Transfer of shares from TKI to Phase 1		Relevance; Hearsay; Requires witness testimony Inaccurate description of exhibit.
118	Rachmuth escrow 399k for TKI		Requires witness testimony.
119	Bahamas \$350,000 to TKI		Requires witness testimony
120	Funds to Stem		Requires witness testimony
121	PDGO Phase 1 Agreement \$41k per month		Requires witness testimony
122	SPRV Phase 1 Agreement \$20k per month		Requires witness testimony
123	Phase 1 is Rachmuth's entity	X	
124	Ed Loan		Requires witness testimony
125	Bronson ledger		Requires witness testimony
126	Top Knot Escrow		Requires witness testimony
127	Selkirk credits		Requires witness testimony
128	Payment in trust		Hearsay; Requires witness testimony

129	15% to Stem		Requires testimony of a witness
130	UMB account statement as of 5/31/21 (ahead of June 2021 hearing)	X	
134	Letter re: Bronson's view on issues	X	
135	DE 424-2	X	
136	Same as Defendant's Ex. G.	X	
137	MacCallen Formation (labeled ex 151)	X	
138	DMV 912	X	
139	DFT 802	X	
140	Top Knot Account x 7379 10/22	X	
141	Top Knot Account x 7379 11/22	X	
142	Scottsdale Account for V2IP 11/22	X	